



5. On November 20, 2024, the parties attend a settlement conference with Magistrate Judge Weisman and indicated that they believed discovery matters could be stayed so that the parties can focus their efforts on settlement.

6. The parties are now working with the Court to schedule a settlement conference in mid-January and the pending discovery motions have been entered and continued pending the settlement conference.

7. To allow the parties to focus their resources on settlement and preserve judicial resources, Defendants believe that briefing on the motions to dismiss should be stayed until the parties have a meaningful opportunity to resolve this matter through settlement.

8. As such, Defendants request a stay of the briefing on the motions and propose to submit a joint status report on February 1, 2025 to the Court reporting on the likelihood of informal resolution or with a proposed briefing schedule if settlement seems unlikely at that juncture.

9. Defendants reached out to Plaintiff's counsel regarding the relief sought herein and Plaintiff's counsel indicated that he had no objection to the relief sought herein. Plaintiff's counsel did indicate that the briefing schedule should be set out in this motion and in place before the settlement conference. However, because the settlement conference date has not yet been confirmed, Defendants believe it is the best approach to file a status report with a briefing schedule.

10. The relief sought herein will not prejudice any party and is not sought to delay the proceedings or for any other unjust reason.

### **Conclusion**

Wherefore, Defendants ask the Court to enter an order staying briefing on the parties' pending motions to dismiss pending the outcome of the settlement conference that both sides are working to schedule in mid January; requiring a joint status report be filed on or before February

1, 2025 with a status of settlement discussions or a briefing schedule on the motions; and for all other relief that the Court deems just and appropriate.

Dated: December 6, 2024

Respectfully submitted,

**SARAH HALVERSON**

/s/ Sabreena El-Amin

Defendant's Attorney

Scott Browdy

[sbrowdy@ctmlegalgroup.com](mailto:sbrowdy@ctmlegalgroup.com)

Sabreena El-Amin

[Sel-amin@ctmlegalgroup.com](mailto:Sel-amin@ctmlegalgroup.com)

CTM Legal Group

77 W. Washington St.

Ste. 2120

Chicago, IL 60602

P: 312-818-6700

F: 312-492-4804

**CERTIFICATE OF SERVICE**

Under penalties as provided by law pursuant to 735 ILCS 5/1-109, the undersigned certifies that a true and correct copy of the foregoing **HALVERSON'S MOTION TO STAY BRIEFING SCHEDULE** were served via email to all counsel of record in this matter on December 6, 2024.

Signed and certified by: /s/ Scott Browdy

Scott Browdy  
Attorney at Law

Scott Browdy  
[sbrowdy@ctmlegalgroup.com](mailto:sbrowdy@ctmlegalgroup.com)  
Sabreena El-Amin  
[Sel-amin@ctmlegalgroup.com](mailto:Sel-amin@ctmlegalgroup.com)  
CTM Legal Group  
77 W. Washington St.  
Ste. 2120  
Chicago, IL 60602  
[Info@ctmlegalgroup.com](mailto:Info@ctmlegalgroup.com)  
P: 312-818-6700  
F: 312-492-4804